

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CRAFTWOOD LUMBER COMPANY, an)
Illinois corporation; CRAFTWOOD II, INC.,)
a California Corp.; and)
CRAFTWOOD III, INC., a California)
Corp.,)

Plaintiffs,)

v.)

HORIZON GLOBAL CORPORATION, a)
Delaware Corp.; HORIZON GLOBAL)
AMERICAS, INC., a Delaware Corp.; and)
COMPREHENSIVE MARKETING, INC.,)
an Illinois Corp.)

Defendants.)

Case No. _____

DEFENDANTS' JOINT NOTICE OF REMOVAL

Horizon Global Corporation, Horizon Global Americans, Inc. and Comprehensive Marketing, Inc. ("Defendants"), by their attorneys and pursuant to 28 U.S.C. §§ 1441(a) and 1446, hereby remove the above-entitled action from the Circuit Court of Lake County, Illinois to the United States District Court for the Northern District of Illinois, and as grounds for removal state the following:

1. On August 31, 2017 Plaintiffs Craftwood Lumber Company, Craftwood II, Inc. and Craftwood III, Inc. ("Plaintiffs") filed a complaint in the Circuit Court of Lake County, Illinois captioned *Craftwood Lumber Company, et al. v. Horizon Global Corporation, et al.*, No. 17 CH 1213 (the "State Court Action").

2. Plaintiff's complaint alleges one cause of action against Defendants pursuant to the federal Telephone Consumer Protection Act, 47 U.S.C. § 227. This case arises under federal law.

3. Defendants have not been formally served, but have agreed to acknowledge service of the complaint in the State Court Action effective September 8, 2017. A copy of the complaint

and all other pleadings, attachments and orders served on Defendants in the State Court Action are attached hereto as **Exhibit 1**, pursuant to 28 U.S.C. § 1446(a).

4. No other process, pleadings or orders have been served on Defendants in the State Court Action. Accordingly, this Notice of Removal is timely under 28 U.S.C. §1446(b), as it is filed within thirty days after Defendants were served with a copy of the initial pleading setting forth the claim for relief upon which this action is based.

5. Furthermore, removal of the State Court Action to this Court is proper pursuant to 28 U.S.C. § 1441(a). The complaint in the State Court Action alleges a federal cause of action over which this Court has original jurisdiction, and the Northern District of Illinois, Eastern Division, embraces the Circuit Court of Lake County where the State Court Action is pending.

6. Defendants will give prompt written notice of the filing of this Notice of Removal to counsel for Plaintiff, and will file a copy of the Notice of Removal with the Clerk of the Circuit Court of Lake County, as provided by 28 U.S.C. §1446(d).

WHEREFORE, Defendants Horizon Global Corporation, Horizon Global Americans, Inc. and Comprehensive Marketing, Inc. request that this Court issue an order or process as may be necessary to bring before it all parties to the State Court Action, pursuant to 28 U.S.C. § 1447(a).

Jointly submitted,

HORIZON GLOBAL CORPORATION
HORIZON GLOBAL AMERICAS, INC.

COMPREHENSIVE MARKETING, INC.

By: /s/ Bart T. Murphy
One of its Attorneys

By: /s/ Paul Bozych (with permission)
One of its Attorneys

Bart T. Murphy
Martha O'Connor
ICE MILLER LLP
2300 Cabot Dr.
Suite 455
Lisle, IL 60532
(630) 955-6392
bart.murphy@icemiller.com
martha.o'connor@icemiller.com

Isaac J. Colunga
ICE MILLER LLP
200 W. Madison St.
Suite 3500
Chicago, Illinois 60606
(312) 726-8148
isaac.colunga@icemiller.com

*Counsel for Horizon Global Corporation
and Horizon Global Americas, Inc.*

Paul Bozych, Esq.
John J. Murphy, Esq.
Preetha Jayakumar, Esq.
NIELSEN, ZEHE & ANTAS, P.C.
55 West Monroe Street, Suite 1800
Chicago, IL 60603-5001
(312) 322-9900
pbozych@nzalaw.com
jmurphy@nzalaw.com
pjayakumar@nzalaw.com

Counsel for Comprehensive Marketing, Inc.

CERTIFICATE OF SERVICE

The undersigned, an attorney, with permission from the joint party listed in this document, states that on September 29, 2017 he caused the foregoing to be filed with the Clerk of the United States District Court for the Northern District of Illinois, and a copy of which will be served on the following counsel of record at the address below:

Peter Trobe
Michael D. Furlong
404 W. Water Street
Waukegan, Illinois 60085
(847) 625-8700

*Counsel for Plaintiffs Craftwood Lumber Company,
Craftwood II, Inc.; Craftwood III, Inc.*

s/Isaac J. Colunga _____